

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE HELIUS MEDICAL
TECHNOLOGIES LITIGATION

Case No.: 19 Civ. 6365 (LAP)

**STIPULATION AND ~~PROPOSED~~
ORDER OF VOLUNTARY DISMISSAL
WITHOUT PREJUDICE**

WHEREAS:

1. On July 9, 2019, Plaintiff Theo Caramihai filed a class action, alleging violations of the anti-fraud provisions of the Federal Securities laws against Defendants Helius Medical Technologies, Inc. (“Helius”), Philippe Deschamps, Joyce LaViscount, Jonathan Sackier (ECF No. 1); and

2. On December 3, 2019, the Court issued an order consolidating two related cases (ECF. No. 24); and

3. On April 28, 2020, the Court issued an order appointing William Dodson lead plaintiff (“Lead Plaintiff”) in this consolidated action, and approving their selection of The Rosen Law Firm, P.A. as lead counsel (ECF. No. 25); and

4. Pursuant to F.R.C.P. 41(a)(1)(A)(ii), Lead Plaintiff wishes to dismiss this action voluntarily, without prejudice; and

5. Lead Plaintiff has not moved for nor has the Court certified a class,

NOW THEREFORE, the parties, through their counsel, agree that pursuant to F.R.C.P. 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, Lead Plaintiff William Dodson hereby voluntarily dismisses this action, without prejudice, against all Defendants and that all parties will bear their own fees and costs to date related to this action.

Dated: June 30, 2020

Respectfully submitted,

THE ROSEN LAW FIRM, P.A.

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Attorneys for Defendants

The Clerk of the Court shall mark this action closed and all pending motions denied as moot.

SO ORDERED, this 1 day of July, 2020.

The Honorable Loretta A. Preska
United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that on June 30, 2020, I electronically filed the foregoing ***Stipulation And [Proposed] Order Of Voluntary Dismissal Without Prejudice*** with the Clerk of Court using the CM/ECF system, which will send notification of such to all CM/ECF participants.

THE ROSEN LAW FIRM, P.A.

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Lead Counsel for Lead Plaintiff and the Class